

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

2021 MAY 20 PM 4:12

OFFICE OF THE CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CARNEY TURNER aka "Tez,"
JULISHA BIGGS aka "Juju," and
SIDNEY MARKER,

Defendants.

8:21CR78

SUPERSEDING INDICTMENT

18 U.S.C. § 1594(c)

18 U.S.C. § 1591(a)

18 U.S.C. § 2422(b)

The Grand Jury charges that

COUNT I
(Conspiracy to Engage in Sex Trafficking of a Minor)

1. Beginning on an unknown date, but from at least on or about January 2020, and continuing through on or about April 2021, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendants, CARNEY TURNER aka "Tez," JULISHA BIGGS aka "Juju," and SIDNEY MARKER did unlawfully, willfully and knowingly conspire, combine, confederate and agree together and with each other, and with others known and unknown to the Grand Jury, to knowingly recruit, entice, harbor, transport, provide, obtain and maintain three minor females identified as MINOR VICTIM 1, MINOR VICTIM 2, and MINOR VICTIM 3, each name and date of birth fully known to the Grand Jury, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, and having had a reasonable opportunity to observe MINOR VICTIM 1, MINOR VICTIM 2, and MINOR VICTIM 3, and knowing and in reckless disregard that MINOR VICTIM 1, MINOR VICTIM 2, and MINOR VICTIM 3 were each under the age of 18 years old and knowing and in reckless disregard

that MINOR VICTIM 1, MINOR VICTIM 2, and MINOR VICTIM 3 would be caused to engage in a commercial sex act in violation of Title 18, United States Code, Section 1591(a).

WAYS, MANNER, AND MEANS OF THE CONSPIRACY

2. The purpose of the conspiracy was to obtain money and other items of value for members of the conspiracy.

3. Members of the conspiracy would and did use MINORS to facilitate the conspiracy.

4. Members of the conspiracy recruited MINOR VICTIM 1, MINOR VICTIM 2, and MINOR VICTIM 3, who were under the age of 18 years old, to be prostituted.

5. Members of the conspiracy would and did instruct the MINOR VICTIMs and young women how to advertise, solicit, and charge for commercial sex acts.

6. Members of the conspiracy obtained commercial sex customers for MINOR VICTIMs by purchasing and/or posting advertisements on internet sites such as www.skipthegames.eu. Sex customers responded to the advertisements via telephone and text message and commercial sex acts were coordinated to occur at various hotels, motels, and other locations.

7. Members of the conspiracy would and did use vehicles and public highways to drive the MINOR VICTIMs to various hotels, motels, and other locations for commercial sex acts, including Omaha, Nebraska and Council Bluffs, Iowa.

8. Members of the conspiracy obtained and paid for various hotel and motel rooms for commercial sex acts involving the MINOR VICTIMs.

9. Members of the conspiracy rented an apartment and made the apartment available for commercial sex acts involving the MINOR VICTIMs.

10. Members of the conspiracy did destroy evidence in furtherance of the conspiracy.

11. Members of the conspiracy would and did require the MINOR VICTIMs to pay a portion or all of the payments received for commercial sex acts to members of the conspiracy.

In violation of Title 18, United States Code, Section 1594(c).

COUNT II

On or about November 17, 2020, through February 2021, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendant, CARNEY TURNER aka "Tez," did knowingly recruit, entice, harbor, transport, provide, obtain and maintain a girl identified as MINOR VICTIM 1, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, and having had a reasonable opportunity to observe MINOR VICTIM 1 and knowing and in reckless disregard that MINOR VICTIM 1 was under the age of 18 years old and knowing and in reckless disregard that MINOR VICTIM 1 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a).

COUNT III

On or about August 1, 2020, through October 31, 2020, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendant, CARNEY TURNER aka "Tez," did knowingly recruit, entice, harbor, transport, provide, obtain and maintain a girl identified as MINOR VICTIM 2, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, and having had a reasonable opportunity to observe MINOR VICTIM 2 and knowing and in reckless disregard that MINOR VICTIM 2 was under the age of 18 years old and knowing and in reckless disregard that MINOR VICTIM 2 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a).

COUNT IV

On or about January 1, 2020, through September 25, 2020, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendant, CARNEY TURNER aka “Tez,” did knowingly recruit, entice, harbor, transport, provide, obtain and maintain a girl identified as MINOR VICTIM 3, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, and having had a reasonable opportunity to observe MINOR VICTIM 3 and knowing and in reckless disregard that MINOR VICTIM 3 was under the age of 18 years old and knowing and in reckless disregard that MINOR VICTIM 3 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a).

COUNT V

On or about August 1, 2020, through October 31, 2020, in the District of Nebraska, CARNEY TURNER aka “Tez,” did use a facility and means of interstate commerce to knowingly attempt to persuade, induce, and entice MINOR VICTIM 2, an individual who had not attained the age of 18 years, to engage in prostitution.

In violation of Title 18, United States Code, Section 2422(b).

COUNT VI

On or about January 1, 2020, through September 25, 2020,, in the District of Nebraska, CARNEY TURNER aka “Tez,” did use a facility and means of interstate commerce to knowingly attempt to persuade, induce, and entice MINOR VICTIM 3, an individual who had not attained the age of 18 years, to engage in prostitution.

In violation of Title 18, United States Code, Section 2422(b).

FORFEITURE ALLEGATION

1. The allegations contained in Counts I through IV of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 1594(d).

2. Pursuant to 18 U.S.C. § 1594(d), upon conviction of an offense in violation of 18 U.S.C. § 1591, the defendants, CARNEY TURNER, JULISHA BIGGS aka “Juju,” and SIDNEY MARKER, shall forfeit to the United States:

- a. any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offense; and
- b. any property, real or personal, constituting or derived from, any proceeds that the defendant obtained, directly or indirectly, as a result of the offense.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of defendants CARNEY TURNER,

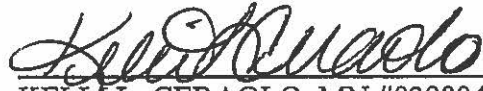
JULISHA BIGGS aka "Juju," and SIDNEY MARKER up to the value of said property listed above as being subject to forfeiture.

Criminal forfeiture, in violation of Title 18, United States Code, Section 1594.

A TRUE BILL.

FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.


KELLI L. CERAOLO, MN #0398049
Assistant U.S. Attorney